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8 STEVEN R. JAFFE

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 STEVEN R. JAFFE,

15 Plaintiff,

16 vs.

17 COUNTY OF SANTA CLARA, VALLEY
MEDICAL CENTER, SUSAN MURPHY,
18 IRA LUBELL, M.D., ROBERT
BOWMAN, M.D., MONEESHA PINTO,
19 M.D., MARIA ALTO, DAVID BURTON
and MARYANNE BARRY,

20 Defendants.
21

CASE NO. C 03-00137 WHA

**~~[PROPOSED]~~ ORDER COMPELLING
RESPONDENTS TO PRODUCE
DOCUMENTS**

THE HONORABLE WILLIAM ALSUP

1 Plaintiff Steven R. Jaffe filed a discovery relief letter on June 23, 2008, requesting an
2 order compelling the individual Defendants, Santa Clara County, Santa Clara Main Jail, and
3 Santa Clara County Valley Medical Center (collectively "Respondents") to comply with a variety
4 of discovery requests. After a responsive letter brief from Respondents and a meet and confer,
5 the Court held a hearing on July 2, 2008. Having heard the arguments of the parties, and having
6 considered their submissions and the file in this matter, and for good cause showing, the Court
7 rules as follows:

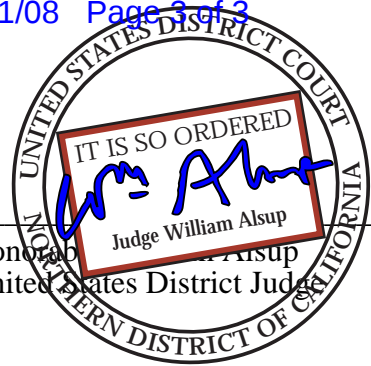
8 1. By July 23, 2008, Respondents shall produce to Plaintiff all documents relating to
9 lawsuits filed against any of the Defendants for each lawsuit raising allegations regarding the
10 inadequate medical treatment and/or medical neglect of patients. The documents to be produced
11 include, but are not limited to, court filings, deposition transcripts, deposition videos, documents
12 produced through discovery, discovery responses, correspondence, and settlement and other
13 agreements. Respondents' production under this Order is subject to the following conditions:

14 2. Respondents' production under this Order is limited to lawsuits that were either
15 initiated during Plaintiffs' custody at the Santa Clara County Jail, January 16, 2002, through May
16 8, 2003, or lawsuits raising allegations relating to events occurring within that same time period.

17 3. Respondents must produce documents covered by this Order even if these
18 documents are subject to a protective order in another lawsuit. As required to comply with this
19 Order, Plaintiff and Respondents will cooperate to amend any protective orders in other lawsuits
20 and create a protective order in this lawsuit.

21 4. Respondents need not produce documents otherwise covered by this Order if they
22 are subject to the attorney-client privilege and/or attorney-work-product protection; however,
23 Respondents must produce, concurrently with the documents produced under this Order, a log of
24 withheld documents with the information required for privilege logs in the Supplemental Order
25 filed in this case on February 20, 2008.

26 IT IS SO ORDERED.
27
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2 DATED: July 11, 2008

By: _____

Honorable Judge William Alsup
United States District Judge

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4 APPROVED AS TO FORM:

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6 DATED: July 9, 2008

MUNGER, TOLLES & OLSON LLP
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PAUL J. KATZ

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9 By: /s/ Paul J. Katz

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11 Attorneys for Plaintiff
STEVEN R. JAFFE

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13 DATED: July 7, 2008

OFFICE OF THE COUNTY COUNSEL
COUNTY OF SANTA CLARA
ANN MILLER RAVEL
MELISSA KINIYALOCTS

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15
16 By: /s/ Melissa Kiniyalocts

17 Attorneys for Defendants IRA LUBELL, M.D.;
18 ROBERT BOWMAN, M.D.; and MONEESHA
19 PINTO, M.D.
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